

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

GREETING CARD ASSOCIATION INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS HAGENSTEIN (I)

Pursuant to Order No. 5875 and 39 CFR sec. 3020.116, the Greeting Card Association (GCA) submits interrogatories and/or requests for documents, as follows:

GCA/USPS-T-3/1 to 3

The term “documents” includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, “documents” includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of these interrogatories may be re-directed to one or more other witness(es), or answered institutionally, as necessary.

May 17, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T-3/1

1. Please refer to page 6 of your prefiled testimony, where you state that “Furthermore, differing CETs for FCM and packages, leading to separate networks for separate products, has reduced utilization efficiency.”

(a) Are differing CETs for FCM and packages the sole cause of separate networks?

(b) If your answer to (a) is negative, please describe the other causes of separate networks.

GCA/USPS-T-3/2

2. (a) At page 8 of your prefiled testimony, you state that First-Class volume used as an input is based on the second-highest Wednesday in the month of March 2020. Please explain fully the reasons for choosing this day’s volume as the input for the modeling.

(b) At the same page, you state that package volume used as an input is based on the second-highest Wednesday in October 2020. Please explain fully the reasons for choosing this day’s volume as the input for the modeling.

GCA/USPS-T-3/3

3. (a) Please refer to page 20 of your prefiled testimony. Footnote 20 on that page indicates that the “rural”/“urban” distinction discussed on that page and illustrated in the graphic refers to the *destination* point as either “rural” or “urban.” Does the model produce, or allow for the production of, results showing the distribution between “rural” and “urban” of *origination* points for the subject mail?

(b) If your answer to part (a) is affirmative, please provide the distribution, as between “rural” and “urban” origination points, for the subject mail.

(c) If your answer to part (a) is negative, are you aware of any estimate or assumption used by the Postal Service with respect to the distribution between “rural” and “urban” of origination points for the subject mail? If so, please (i) describe the estimate or assumption, and (ii) state whether, to your knowledge, that estimate or assumption was used in developing the plan for changed First-Class service standards; and, if it was, how it was used.